



THE CITY OF NEW YORK  
**LAW DEPARTMENT**  
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March 12, 2020

BY ECF

Honorable Andrew L. Carter, Jr.  
United States District Judge  
United States District Court  
Southern District of New York  
40 Foley Square  
New York, New York 10007

MEMO ENDORSED

Re: Jermaine Dunham v. City of New York,  
11 Civ. 1223 (ALC) (SLC)

Your Honor:

I am a Senior Counsel in the office of James E. Johnson, Corporation Counsel of the City of New York, representing defendants City of New York, Lamar Oliver and Philip Lobello in the above-referenced matter. I write on behalf of defendants to respectfully request a one-week extension of time from March 13, 2020 until March 20, 2020, in which to file their motion for summary judgment. Plaintiff's counsel, Maxwell W. Brown, Esq., consents to this request. This is defendants' first request for an extension of time to file their motion for summary judgment.

I sincerely apologize for the lateness of this request, however, due to unforeseen circumstances; it has become apparent that defendants will be unable to file their motion for summary judgment by tomorrow. Defendants also request a corresponding extension of time for the filing of opposition and reply papers to April 17, 2020 for opposition and May 1, 2020 for reply.

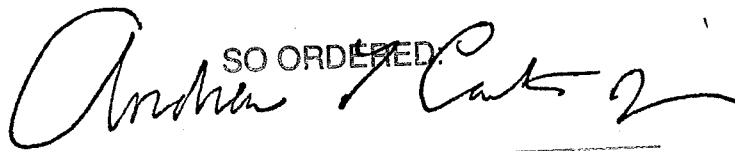
Defendants thank Your Honor for your consideration herein and once again apologize for the late hour of this request.

Respectfully submitted,

/s/

Joseph Zangrilli  
*Senior Counsel*  
Special Federal Litigation Division

CC: Maxwell W. Brown, Esq. (*Via ECF*)  
Jason E. Kornmehl, Esq. (*Via ECF*)

 SO ORDERED.

HON. ANDREW L. CARTER, JR.  
UNITED STATES DISTRICT JUDGE

March 12, 2020